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20  
21 **UNITED STATES DISTRICT COURT**  
22 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
23 **SAN JOSE DIVISION**

24 XILINX, INC.,

25 Plaintiff,

26 v.

27 INVENTION INVESTMENT FUND I LP,  
INVENTION INVESTMENT FUND II LLC,  
INTELLECTUAL VENTURES LLC,  
INTELLECTUAL VENTURES  
MANAGEMENT LLC,  
INTELLECTUAL VENTURES I LLC, and  
INTELLECTUAL VENTURES II LLC,

Defendants.

Case No.: C 11-cv-0671-LHK

**DECLARATION OF AMEET A. MODI  
IN SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS XILINX'S  
COMPLAINT FOR DECLARATORY  
JUDGMENT**

1 I, Ameet A. Modi, declare that:

2 1. I am an associate in the law firm Desmarais LLP and counsel for Defendants in the  
3 present action. I am competent to give this Declaration. Except where otherwise indicated, I make this  
4 Declaration based on personal knowledge.

5 2. Attached hereto as Ex. A is a true and correct copy of the Complaint as filed by  
6 Intellectual Ventures I LLC and Intellectual Ventures II LLC on December 8, 2010 in Case No. 1:10-cv-  
7 1065-LPS in the District of Delaware.

8 3. Attached hereto as Ex. B is a true and correct copy of the Answer, Affirmative Defenses,  
9 And Counterclaims To Plaintiffs' First Amended Complaint as filed by Altera Corporation on March 4,  
10 2011 in Case No. 1:10-cv-1065-LPS in the District of Delaware.

11 4. Attached hereto as Ex. C is a true and correct copy of the Answer, Defenses, And  
12 Counterclaims To Plaintiffs' First Amended Complaint as filed by Lattice Semiconductor Corporation  
13 on March 4, 2011 in Case No. 1:10-cv-1065-LPS in the District of Delaware.

14 5. Attached hereto as Ex. D is a true and correct copy of the First Amended Answer,  
15 Affirmative Defenses, And Counterclaims To First Amended Complaint as filed by Microsemi  
16 Corporation on March 22, 2011 in Case No. 1:10-cv-1065-LPS in the District of Delaware.

17 6. Attached hereto as Ex. E is a true and correct copy of the First Amended Complaint as  
18 filed by Intellectual Ventures I LLC and Intellectual Ventures II LLC on February 15, 2011 in Case No.  
19 1:10-cv-1065-LPS in the District of Delaware.

20 7. Attached hereto as Ex. F is a true and correct copy of a printout from  
21 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "5524251" into the "Patent  
22 Number" field.

23 8. Attached hereto as Ex. G is a true and correct copy of a printout from  
24 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "5751736" into the "Patent  
25 Number" field.

26 9. Attached hereto as Ex. H is a true and correct copy of a printout from  
27 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "5887165" into the "Patent  
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1 Number" field.

2 10. Attached hereto as Ex. I is a true and correct copy of a printout from  
3 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "6321331" into the "Patent  
4 Number" field.

5 11. Attached hereto as Ex. J is a true and correct copy of a printout from  
6 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "6747350" into the "Patent  
7 Number" field.

8 12. Attached hereto as Ex. K is a true and correct copy of a printout from  
9 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "6768497" into the "Patent  
10 Number" field.

11 13. Attached hereto as Ex. L is a true and correct copy of a printout from  
12 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "7100061" into the "Patent  
13 Number" field.

14 14. Attached hereto as Ex. M is a true and correct copy of a printout from  
15 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "6687865" into the "Patent  
16 Number" field.

17 15. Attached hereto as Ex. N is a true and correct copy of a printout from  
18 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "6993669" into the "Patent  
19 Number" field.

20 16. Attached hereto as Ex. O is a true and correct copy of a printout from  
21 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "7080301" into the "Patent  
22 Number" field.

23 17. Attached hereto as Ex. P is a true and correct copy of a printout from  
24 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "5687325" into the "Patent  
25 Number" field.

26 18. Attached hereto as Ex. Q is a true and correct copy of a printout from  
27 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "6252527" into the "Patent  
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1 Number" field.

2 19. Attached hereto as Ex. R is a true and correct copy of a printout from  
3 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "6260087" into the "Patent  
4 Number" field.

5 20. Attached hereto as Ex. S is a true and correct copy of a printout from  
6 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "6272646" into the "Patent  
7 Number" field.

8 21. Attached hereto as Ex. T is a true and correct copy of a printout from  
9 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "6408415" into the "Patent  
10 Number" field.

11 22. Attached hereto as Ex. U is a true and correct copy of a printout from  
12 <http://assignments.uspto.gov/assignments/?db=pat> generated by inputting "6698001" into the "Patent  
13 Number" field.

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15  
16 I declare under penalty of perjury that the foregoing is true and correct.

17  
18 Executed in New York, New York.

19  
20 DATED: April 11, 2011

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22 \_\_\_\_\_  
Ameet A. Modi